

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454-GKF-jfj
)	
1) CASTLE HILL STUDIOS LLC)	
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

**DECLARATION OF MICHAEL SAWYER IN SUPPORT OF PLAINTIFF
VIDEO GAMING TECHNOLOGIES, INC.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. ("VGT").

2. Attached as **Exhibit I** is a true and correct copy of excerpts from the deposition testimony of Paul Suggs, dated June 8, 2018.

3. Attached as **Exhibit J** is a true and correct copy of excerpts from the deposition testimony of Jon P. Yarbrough, dated July 11, 2018.

4. Attached as **Exhibit K** is a true and correct copy of VGT's Deposition Ex. 378, which was used during the deposition of Paul Suggs on June 8, 2018, and is marked with Bates numbers VGT0006912-15.

5. Attached as **Exhibit L** is a true and correct copy of VGT's Deposition Ex. 407, which was used during the deposition of Brandon H. Booker on July 10, 2018, and is marked with Bates numbers VGT0006862-63.

6. Attached as **Exhibit M** is a true and correct copy of excerpts from the deposition testimony of Robert M. Zeidman, dated September 28, 2018.

7. Attached as **Exhibit N** is a true and correct copy of excerpts from the deposition testimony of Andrew C. Scheiner, dated April 19, 2018.

8. Attached as **Exhibit O** is a true and correct copy of VGT's Deposition Ex. 161, which was used during the deposition of Andrew C. Scheiner on April 19, 2018, and is marked with Bates numbers CHG0087147-49.

9. Attached as **Exhibit P** is a true and correct copy of VGT's Deposition Ex. 160, which was used during the deposition of Andrew C. Scheiner on April 19, 2018, and is marked with Bates number CHG0086662.

10. Attached as **Exhibit Q** is a true and correct copy of VGT's Deposition Ex. 162, which was used during the deposition of Andrew C. Scheiner on April 19, 2018, and is marked with Bates numbers CHG0089317-20.

11. Attached as **Exhibit R** is a true and correct copy of excerpts from the deposition testimony of Joshua P. Larson, dated April 24, 2018.

12. Attached as **Exhibit S** is a true and correct copy of VGT's Deposition Ex. 488, which was used during the deposition of Alan Roireau on August 1, 2018.

13. Attached as **Exhibit T** is a true and correct copy of the report of Robert Zeidman, dated August 31, 2018.

14. Attached as **Exhibit U** is a true and correct copy of VGT's Deposition Ex. 163, which was used during the deposition of Andrew C. Scheiner on April 19, 2018, and is marked with Bates number CHG0089313.

15. Attached as **Exhibit V** is a true and correct copy of Interrogatory No. 14 in VGT's Second Set of Interrogatories to CHG, dated January 18, 2018.

16. Attached as **Exhibit W** is a true and correct copy of the Response to Interrogatory No. 14 in CHG's Objections and Answers to Plaintiff's Second Set of Interrogatories, dated February 20, 2018.

17. Attached as **Exhibit X** is a true and correct copy of an email sent from Mr. Gill to Mr. Rubman, dated August 2, 2018.

18. Attached as **Exhibit Y** is a true and correct copy of excerpts from the deposition testimony of Richard Williamson, dated June 14, 2018.

19. Attached as **Exhibit Z** is a true and correct copy of excerpts from the deposition testimony of Richard Williamson, dated October 2, 2018.

20. Attached as **Exhibit AA** is a true and correct copy of Document Request Nos. 94 and 95 in CHG's Third Request for Production of Documents and Things to VGT, dated May 4, 2018.

21. Attached as **Exhibit BB** is a true and correct copy of excerpts from the deposition testimony of Jay D. Seigny, dated July 12, 2018.

22. Attached as **Exhibit DD** is a true and correct copy of excerpts from the deposition testimony of Jason Sprinkle, dated May 18, 2018.

23. Attached as **Exhibit GG** is a true and correct copy of excerpts from the deposition testimony of Zachary Schmid, dated June 20, 2018.

24. Attached as **Exhibit HH** is a true and correct copy of excerpts from the deposition testimony of Alan Roireau, dated August 1, 2018.

25. Attached as **Exhibit II** is a true and correct copy of VGT's Deposition Ex. 380, which was used during the deposition of Paul Suggs on June 8, 2018.

26. Attached as **Exhibit JJ** is a true and correct copy of excerpts from the deposition testimony of Alan Roireau, dated May 15, 2018.

27. Attached as **Exhibit KK** is a true and correct copy of excerpts from the deposition testimony of Will Harvie, dated June 15, 2018.

28. Attached as **Exhibit LL** is a true and correct copy of an email sent by Mr. Platt to Mr. Sawyer, dated July 26, 2018.

29. Attached as **Exhibit MM** is a true and correct copy of VGT's Notice of Deposition of CHG, dated February 5, 2018.

30. Attached as **Exhibit NN** is a true and correct copy of the Opening Expert Report of Stacy Friedman, dated August 10, 2018.

31. Attached as **Exhibit OO** is a true and correct copy of VGT's Deposition Ex. 153, which was used during the deposition of Andrew C. Scheiner on April 19, 2018, and is marked with Bates numbers CHG0089197-98.

32. Attached as **Exhibit PP** is a true and correct copy of VGT's Deposition Ex. 381, which was used during the deposition of Paul Suggs on June 8, 2018.

33. Attached as **Exhibit QQ** is a true and correct copy of VGT's Deposition Ex. 379, which was used during the deposition of Paul Suggs on June 8, 2018, and is marked with Bates numbers CHG0087214-15.

34. Attached as **Exhibit RR** is a true and correct copy of VGT's Deposition Ex. 141, which was used during the deposition of Andrew C. Scheiner on April 19, 2018, and is marked with Bates number CHG0087698-709.

35. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 12, 2018 in Washington, District of Columbia.

/s/ Michael Sawyer
Michael Sawyer

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2018, I filed the foregoing Declaration of Michael Sawyer via ECF, which caused service to be effected on the following counsel for Defendants:

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